

1 how much space does a tech need to get in there and work
2 on the equipment from --

3 A I would imagine at least the standard would be
4 a two-foot wide aisle.

5 Q All right.

6 Now, you were talking about amphenol plugs. Is
7 that what you referred to?

8 A The way we build the cage it could be amphenol
9 connected to the -- from that piece of equipment back over
10 to the blocks where the DS-0s come in and terminate inside
11 the -- I believe we have Reltec R-399 blocks in a lot of
12 locations.

13 Q Okay. And do you have these amphenol plugs on
14 both the front and the back of the DSLM?

15 A No, the DS-3 connects to the back and the
16 amphenol tail goes out and connects to where the DS-0
17 loops come in.

18 Q Okay. How are -- as to all the jacks that come
19 in and out of the DSLM, how are those connected to the
20 piece of -- to the DSLM?

21 A There is, I believe, a 25 pair cable that comes
22 out and connects to the blocks that we have, and the other
23 one is like a screw-on fitting, a BNC connector that
24 connects to the back.

25 Q So one's a screw-on fitting.

26 Do you have any where you just pull it out with

27 the plug?

28 A I don't think so.

PUBLIC UTILITIES COMMISSION, STATE OF CALIFORNIA
SAN FRANCISCO, CALIFORNIA

1 Q Okay.

2 Now, if someone were to take one of those
3 screw-on plugs and unscrew them and pull them out of your
4 equipment, would that affect your service at all?

5 A Yes, it would.

6 Q And those screw-in plugs, those are
7 hand-tightened, is that right?

8 A No. There's a small tool that they use to
9 tighten it down --

10 Q Tighten it down.

11 A -- so they're not overtightened or
12 undertightened.

13 Q Okay.

14 Now if that happened in a PacBell office it
15 would be possible, wouldn't it, that that could have
16 happened -- that could have been done either by a CLEC
17 tech or by a PacBell tech, right?

18 A If that was to happen in a central office?

19 Q Yes.

20 A It could happen by anybody who takes it off,
21 yes.

22 Q Now, if that were to happen, even if there were
23 a card reader showing the comings and going of CLEC
24 employees, there would still be a question as to whether
25 that plug had been pulled out by a PacBell tech or a CLEC

26 tech, right?

27 A In regards to knowing specifically, there would

28 be times about -- instantly monitored of when a piece of

PUBLIC UTILITIES COMMISSION, STATE OF CALIFORNIA
SAN FRANCISCO, CALIFORNIA

1 equipment like that was disconnected in the network, and
2 it could be not traced to a particular person but it could
3 be traced to anybody in that building at that time.

4 Q Right. And there's always PacBell people in
5 the buildings for the most part, right?

6 A Right. It's not many offices that are
7 unmanned.

8 Q But for the larger offices, there's PacBell
9 people there all the time, right?

10 A I would say most of the offices with the new
11 5E switches and things like that, there's very few manned
12 offices, and most of them are done with a rover that go
13 from office to office; most of the work done.

14 Q Well, in a situation where it could be that a
15 PacBell person was in the building at the same time, what
16 could PacBell do to demonstrate to you that it wasn't its
17 personnel that unscrewed those plugs?

18 A Well, normally the PacBell person would log in
19 to a central office with a swipe card when they enter, and
20 if anybody else was in there too, there would be a log of
21 them coming in and going out, and as far as investigating
22 an outage or, like, a security agent investigating
23 something that happened, I don't know all the skills that
24 they use on that, but I do know that the -- if large
25 incidents happened, there would be a list probably

26 provided to a security agency to follow up and do an

27 investigation.

28 Q Right. But in that situation it's going to

PUBLIC UTILITIES COMMISSION, STATE OF CALIFORNIA
SAN FRANCISCO, CALIFORNIA

1 come down to one tech's word versus another, right?

2 A Again, with the things that happen, if somebody
3 physically maliciously damaged another person's piece of
4 equipment, I don't think it would be -- I think there
5 would be a lot more investigations and a lot more
6 investigation going on with that rather than taking that
7 lightly.

8 To me, if I was in the building when something
9 like that happened, it would be very serious and it would
10 take a lot of investigation, you know, and all those type
11 of procedures, I don't know.

12 But it seems to me that you would have a very
13 strong list of the people that were there, and if there
14 was a -- intentional damage, it would be handled like any
15 other intentional damage to the network.

16 Q Let me ask you about this escort issue and just
17 get your preferences --

18 A Sure.

19 Q -- in these situations.

20 Let's assume that the -- that forms of
21 collocation not requiring a cage are implemented, but that
22 there is a security escort requirement attached in those
23 situations where CLEC techs would be operating outside of
24 a cage.

25 Are you with me on that?

26 A Hm-hmm.

27 Q Okay.

28 Now, in that situation -- I mean, we just

PUBLIC UTILITIES COMMISSION, STATE OF CALIFORNIA
SAN FRANCISCO, CALIFORNIA

1 talked that PacBell has unmanned offices, correct?

2 A Yes.

3 Q And that's an increasing trend?

4 A Yes.

5 Q In that situation, then, there would have to
6 be -- where a CLEC wanted to go out to an unmanned CO,
7 they would need to arrange to meet with the PacBell
8 technician to be their escort, is that right?

9 A If an escort scenario was set up, yes.

10 Q And so there would actually have to be a meet
11 arranged, is that right?

12 A Yes.

13 Q And, now, does Covad prefer to have to arrange
14 these meets each time they want to go out to the COs, or
15 would they rather be able to enter unescorted even if that
16 meant a cage?

17 A We would be -- let me get that -- would we
18 rather be able to go to a central office -- we prefer to
19 go to a central office unescorted without a cage, and the
20 same way that we do with US West.

21 Q Right. But my hypothetical gave an equipment
22 and escort requirement.

23 A The escort requirement requires additional time
24 and would require additional service parameters
25 established to meet our requirements to correct service

26 outages, and it would add time to that.

27 Q So are you voting, or are you just pointing

28 that out today?

PUBLIC UTILITIES COMMISSION, STATE OF CALIFORNIA
SAN FRANCISCO, CALIFORNIA

1 A I'm -- can you -- are you asking me if I prefer
2 to have an escort or prefer to have a cage?

3 Q Yes.

4 A That's a difficult question to answer because
5 I don't think the two questions correlate, because, no,
6 I don't want a cage and, no, I don't want, you know, an
7 escort.

8 Do I prefer which one; I don't know which one
9 I would prefer most, and I don't want to have either one.

10 ALJ WALWYN: So your answer is you're not choosing?
11 You wouldn't choose either?

12 THE WITNESS: I don't know. I can't make a
13 differentiation between the two.

14 ALJ WALWYN: Okay.

15 MR. DAWSON: Q All right.

16 Then I think we talked -- in your testimony,
17 and now I'm at your testimony -- let me make sure it's
18 your direct -- your direct testimony, page 5.

19 You say that Covad currently has 140 physical
20 collocation requests in varying stages of being processed
21 by PacBell and GTE.

22 Do you see that?

23 A Yes.

24 Q So now is that -- how does that line up with
25 the -- I think you gave me a 145 estimate earlier of

26 actual cages?

27 Are these requests on top of that 145 actual

28 cases that are moving through the mill right now?

PUBLIC UTILITIES COMMISSION, STATE OF CALIFORNIA
SAN FRANCISCO, CALIFORNIA

1 A These 140 -- again, that was an estimate off
2 the top of my head.

3 The 140 physical cases in various -- I would
4 say the actual numbers -- again, the first one was an
5 estimate, and these -- when this document was prepared and
6 we did that, we looked through the actuals.

7 Again I said -- when I said that, it changes on
8 a daily basis.

9 Q Well, I understand that.

10 A The numbers are going to be close, but they're
11 around 140, plus GTE's now.

12 Q These were actually different questions.

13 A Okay. I'll slow down and try to --

14 Q Before I wasn't trying to trap you.

15 Before I had asked you actual number of cages
16 in operation right now.

17 A Yes.

18 Q And that was, you said, about 145. Is that --

19 A That's an -- off the top of my head, the best
20 answer I can give you, yes.

21 Q And here you're talking about actual requests
22 that are in the pipeline, right?

23 A Yes. Yes.

24 Q So these requests in the pipeline would be --

25 A Less than what is actually in price quotes in

26 all of the activity that's taking place.

27 Q But there's no double counting; these are on

28 top of what's already up and working, right?

PUBLIC UTILITIES COMMISSION, STATE OF CALIFORNIA
SAN FRANCISCO, CALIFORNIA

1 A No, no.

2 There is the total -- the total that's in --
3 these are the -- we, right now, have this many in various
4 stages in California.

5 Q Okay. So some of them are up and running --

6 A Some are up and running.

7 Q -- some are in the mill, but 140 is the total
8 for --

9 A Yes.

10 Q -- what you've got going?

11 A Yes.

12 Q Do you have more than one cage in any central
13 office?

14 A I don't want to say it's another cage, but we
15 have -- in San Jose 12 we have what's called a shared
16 cage.

17 It's a two bay cage, and we did apply for
18 another two bays of equipment, and when you do that it's
19 considered another actile, and it's considered another
20 request for a location even though it's in the same
21 10 foot by 10 foot square.

22 So that's the only one that I can say we have
23 two locations in the same central office, but it's in the
24 same 10 foot by 10 foot area.

25 Q So that you're either in, or moving into about

26 140 offices between Pacific and GTEC, is that right?

27 A Yes.

28 Q Okay.

PUBLIC UTILITIES COMMISSION, STATE OF CALIFORNIA
SAN FRANCISCO, CALIFORNIA

1 A Yes.

2 And again I want to say for the record that
3 it's very difficult because the requests, even on the part
4 of Covad, keep coming in and there are changes and adds
5 depending on what each vice-president would like to have
6 in their areas and how much they want to add to.

7 Q I understand.

8 Now, of these 140, how many of them, is it the
9 case, that Covad is the only collocator in the central
10 office?

11 A Percentagewise, I would say 35, 40 percent.

12 A guess again, and this is off the top of my
13 head, I would -- 35 percent, 30 percent or more could be
14 owned.

15 The ones that we go in that no other
16 collocators are there and we order them under the shared
17 cage, so I would have to count up how many shared cages
18 we have and then divide that out, and that would give me a
19 percentage.

20 We have a list of shared cages.

21 Q Okay. And shared cages, this is cages you're
22 sharing with other --

23 A Other CLECs.

24 Q -- with other CLECs?

25 A Right.

26 Q And how frequently are you doing that, then?

27 A Out of all the -- I believe we have around 35

28 or 40 shared cages in California.

PUBLIC UTILITIES COMMISSION, STATE OF CALIFORNIA
SAN FRANCISCO, CALIFORNIA

1 Q Is that becoming standard practice now when you
2 move into a central office, to go in on a shared basis
3 with other CLECs?

4 A We always go shared if there is no other
5 collocator there, and if there is another collocator there
6 then we're not allowed to get shared and we have to get
7 the 10 foot by 10 foot cage.

8 If there is -- let me -- the rule is that,
9 let's say, like, if this was a collocation site, a central
10 office, and I wanted to collocate here and suppose there
11 was another CLEC that already had a 10 foot by 10 foot
12 site here, I would not be allowed to get a two bay shared
13 cage.

14 But if there was nobody here in this office and
15 I wanted to go in and collocate here, I could order a two
16 bay shared cage.

17 And so every site that I apply, I make sure
18 that there's nobody's there, and the ones that no one is
19 there -- when nobody is there, I order a shared cage.

20 Q Well, let me ask you, if you're going into a
21 central office where there's other collocators and there's
22 one cage left, are you able to share in that situation?

23 A No.

24 Q You have to take the cage?

25 A You have to take the cage.

26 Q Now, when you go into a new office and do you

27 sharing, is it two of you, three of you? How many?

28 A The way the tariff reads, and that's on the

PUBLIC UTILITIES COMMISSION, STATE OF CALIFORNIA
SAN FRANCISCO, CALIFORNIA

1 interconnection agreement, is that there's up to three
2 CLECs that can go into that with two bays apiece.

3 Q Now, over on page 7 of your testimony,
4 you're -- down on line 23, you're indicating that you have
5 operational coverage of well over one million homes and
6 businesses.

7 Do you see that?

8 A Yes, I do.

9 Q Is Covad selling to residential customers now?

10 A You mean to an individual residential customer?

11 Q Right.

12 A Not that I know of.

13 Q Okay. Then I'm over on page 13 of -- I think
14 I'm still in your direct here.

15 I am. This is talking about your Regional Data
16 Center in San Jose.

17 Do you see that?

18 A What line are you on?

19 Q Lines 18 to 20?

20 A Okay. I see.

21 Q Okay.

22 Now, the traffic going through -- are you
23 familiar with your regional data center in San Jose?

24 A Again, that's with the network side.

25 It's handled by the network side and

26 operational side of the company.

27 But I've been in there and -- I've been in

28 there. I haven't physically worked in there, but I have

PUBLIC UTILITIES COMMISSION, STATE OF CALIFORNIA
SAN FRANCISCO, CALIFORNIA

1 been in the site many times.

2 Q Okay.

3 So when you refer to it as a regional data
4 center, am I understanding that that facility handles data
5 flows as opposed to voice traffic flows?

6 A Yes, it does. That's where it's aggregated.

7 Q Okay. So there wouldn't be residential voice
8 traffic coming through this --

9 A No, there's not.

10 Q -- center; 911 calls, other emergency service?

11 A No.

12 Q Voice calls --

13 A No, there's not.

14 Q -- things like that?

15 A No.

16 To the best of my knowledge, I would not see it
17 at the RIS.

18 Q Any voice switches in that building for any of
19 the collocators

20 A Well, that a carrier hotel.

21 It's a Mae West building and it probably has
22 a -- in that particular building there's probably a lot of
23 voice but not in our particular site.

24 Q Well, we're talking about your regional data
25 center.

- 26 Were you going outside of that?
- 27 A Yes, I'm going to different floors of that.
- 28 It's a large hotel carrier -- carrier hotel,

PUBLIC UTILITIES COMMISSION, STATE OF CALIFORNIA
SAN FRANCISCO, CALIFORNIA

1 excuse me.

2 But, no, I do not know of any voice outside of
3 the standard Covad network we use for voicemail and things
4 like that.

5 Q Your internal needs?

6 A Internal network. That would be like that.

7 Q Now, so this regional data center is in a large
8 office-type building?

9 A Yes, it is.

10 Q Okay. And there are other telecommunications
11 related businesses on other floors of this building?

12 A Yes. I believe so.

13 Q And Covad has a couple of floors?

14 A One floor. Half of a floor, something.

15 It's not very large, but it's a big -- you
16 know, a big data center. Big enough.

17 Q And this building -- I take it this building
18 was preexisting before Covad moved into it?

19 A Yes, it was.

20 Q And did Covad have any special conditioning
21 requirements for that --

22 A Yes, we did.

23 Q -- space when you moved in?

24 A Yes, we did.

25 Q And what was that?

26 A We had to place some bracing, earthquake
27 bracing on the floor, and we had to install to the zoning
28 specs to put in batteries, backup batteries and things

PUBLIC UTILITIES COMMISSION, STATE OF CALIFORNIA
SAN FRANCISCO, CALIFORNIA